

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

JANE DOE 3,

Plaintiff,

v.

ESSEX, LLC, et al.,

Defendants.

---

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

CIVIL ACTION FILE

NO. 1:19 CV 03843-WMR

**DEFENDANTS CC&S DEVELOPMENT, LLC AND KUZZINS BUFORD,  
LLC'S NOTICE OF INTENT TO SERVE NON-PARTY SUBPOENAS**

COME NOW CC & S DEVELOPMENT, LLC and KUZZINS BUFORD, LLC, pursuant to Federal Rule of Civil Procedure 45(a)(4), by and through counsel, hereby give notice that if no objection by any party is given within fourteen (14) days of the service of this notice, they will serve the attached subpoenas to the following non-parties:

Tracy Bussee  
2255 Cumberland Parkway, S.E., Suite 290  
Atlanta, Georgia 30339

Megan delaRosa  
1626 Frederica Road, Suite 202  
St. Simon's Island, Georgia 31522

Sabrina Harrison, M.D., P.C.  
1875 Old Alabama Road, Suite 210  
Roswell, Georgia 30076

Wellstar Douglas Hospital  
8954 Hospital Drive  
Douglasville, Georgia 30134

Emerald Isle Counseling  
300 Oak Street, Suite 203  
St. Simon's Island, Georgia 31522

Deuser & Associates  
2500 Starling Street, Suite 402  
Brunswick, Georgia 31520

Islands Counseling Services  
Post Office Box 1814  
Tybee Island, Georgia 31410

Northside Hospital  
1000 Johnson Ferry Road, N.E.  
Atlanta, Georgia 30342

Respectfully submitted, this 18<sup>th</sup> day of January, 2023.

**CRUSER, MITCHELL, NOVITZ,  
SANCHEZ, GASTON & ZIMET, LLP**



---

**CRAIG P. TERRETT**

Georgia Bar No. 702

**KRISTIN L. YODER**

Georgia Bar No. 229210

**J. ROBB CRUSER**

Georgia Bar No. 199480

*Attorneys for Defendant Kuzzins Buford,  
LLC and CC&S Development, LLC*

Meridian II, Suite 2000  
275 Scientific Drive  
Peachtree Corners, GA 30092  
(404) 881-2622  
(404) 881-2630 (fax)  
[cterrett@cmlawfirm.com](mailto:cterrett@cmlawfirm.com)  
[kyoder@cmlawfirm.com](mailto:kyoder@cmlawfirm.com)

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

JANE DOE 3,

Plaintiff,

v.

ESSEX, LLC, et al.,

Defendants.

§  
§  
§  
§  
§  
§  
§  
§

CIVIL ACTION

FILE NO. 1:19 CV

~~03843-~~

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of January, 2023 a true and correct copy of the foregoing ***DEFENDANT CC&S DEVELOPMENT, LLC AND KUZZINS BUFORD, LLC'S NOTICE OF INTENT TO SERVE NON-PARTY SUBPOENAS*** was served upon the following parties via electronic mail, as follows:

Charles K. Reed  
Adi Allushi  
Emma J. Fennelly  
Tameika L. Briscoe  
*Lewis Brisbois Bisgaard & Smith LLP*  
*Bank of America Plaza*  
*600 Peachtree St NE, Suite 4700*  
*Atlanta, GA 30308*  
[Chuck.reed@lewisbrisbois.com](mailto:Chuck.reed@lewisbrisbois.com)  
[Adi.allushi@lewisbrisbois.com](mailto:Adi.allushi@lewisbrisbois.com)  
[Emma.fennelly@lewisbrisbois.com](mailto:Emma.fennelly@lewisbrisbois.com)  
[Tameika.briscoe@lewisbrisbois.com](mailto:Tameika.briscoe@lewisbrisbois.com)  
*Attorneys for the Defendants*  
*Westmont Hospitality Group, Inc.,*  
*SUB-SU Hotel GP, LLC, WHG SU*  
*Atlanta, LLC, and WHG SU Atlanta*  
*LP*

John E. Floyd  
Manoj S. Varghese  
Tiana S. Mykkeltvedt  
Amanda Kay Seals  
Michael R. Baumrind  
*Bondurant, Mixson & Elmore, LLP*  
*1201 W. Peachtree St, Ste 3900*  
*Atlanta, GA 30309*  
[floyd@bmelaw.com](mailto:floyd@bmelaw.com)  
[varghese@bmelaw.com](mailto:varghese@bmelaw.com)  
[mykkeltvedt@bmelaw.com](mailto:mykkeltvedt@bmelaw.com)  
[seals@bmelaw.com](mailto:seals@bmelaw.com)  
[baumrind@bmelaw.com](mailto:baumrind@bmelaw.com)  
[reed@bmelaw.com](mailto:reed@bmelaw.com)  
[reed@bmelaw.com](mailto:reed@bmelaw.com)  
[richardson@bmelaw.com](mailto:richardson@bmelaw.com)  
*Attorneys for the Plaintiff Jane Doe 3*

Jonathan S. Tonge  
Patrick J. McDonough  
Trinity Hundredmark  
*Anderson, Tate & Carr, P.C.*  
*One Sugarloaf Centre*  
*1960 Satellite Blvd., Ste 4000*  
*Duluth, GA 30097*  
[jtonge@atclawfirm.com](mailto:jtonge@atclawfirm.com)  
[pmcdonough@actlawfirm.com](mailto:pmcdonough@actlawfirm.com)  
[thundred@atclawfirm.com](mailto:thundred@atclawfirm.com)  
[bwebb@atclawfirm.com](mailto:bwebb@atclawfirm.com)  
*Attorneys for the Plaintiff Jane Doe 3*

Warner S. Fox  
Christopher Shane Keith  
Elliot Crawford Ream  
*Hawkins Parnell & Young, LLP*  
*303 Peachtree Street, NE, Ste 4000*  
*Atlanta, GA 30308-3243*  
[wfox@hpylaw.com](mailto:wfox@hpylaw.com)  
[skeith@hpylaw.com](mailto:skeith@hpylaw.com)  
[eream@hpylaw.com](mailto:eream@hpylaw.com)  
*Attorneys for the Defendant*  
*Varahi Hotel, LLC*

Michael Beene  
[michaelbeeneworld@gmail.com](mailto:michaelbeeneworld@gmail.com)  
515 Stedford Lane  
Duluth, GA 30097

Anthony Cochran  
Emily C. Ward  
*Smith, Gambrell & Russell, LLP*  
*1230 Peachtree St NE*  
*Promenade, Suite 3100*  
*Atlanta, GA 30309-3592*  
[acochran@sgrlaw.com](mailto:acochran@sgrlaw.com)  
[eward@sgrlaw.com](mailto:eward@sgrlaw.com)  
*Attorneys for Essex Hotel*  
*Management, LLC*  
*(misnamed as Essex, LLC)*

Pamela Newsom Lee  
Rachel Wilson Mathews  
Sabrina L. Atkins  
*Swift, Currie, McGhee & Hiers, LLP*  
*The Peachtree, Suite 300*  
*1355 Peachtree St, NE*  
*Atlanta, GA 30309-3231*  
[Pamela.lee@swiftcurrie.com](mailto:Pamela.lee@swiftcurrie.com)  
[Rachel.mathews@swiftcurrie.com](mailto:Rachel.mathews@swiftcurrie.com)  
[Sabrina.atkins@swiftcurrie.com](mailto:Sabrina.atkins@swiftcurrie.com)  
*Attorneys for HSI Chamblee, LLC*

Tradelle Lacy  
[mrlacysbizz@gmail.com](mailto:mrlacysbizz@gmail.com)  
2802 Fullers Alley  
Kennesaw, GA 30144

Anthony Crumbley  
[anthonyjcconstruction@gmail.com](mailto:anthonyjcconstruction@gmail.com)  
373 Lexington Drive  
Lawrenceville, GA 30046

**CERTIFICATE OF COMPLIANCE**

Undersigned counsel certifies the foregoing document has been prepared with one of the font and point selections (Times New Roman, 14 point) approved by the Court in Local Rule 5.1(C).

This 18<sup>th</sup> day of January, 2023, 2022.

**CRUSER, MITCHELL, NOVITZ,  
SANCHEZ, GASTON & ZIMET, LLP**



---

**CRAIG P. TERRETT**

Georgia Bar No. 702

**KRISTIN L. YODER**

Georgia Bar No. 229210

**J. ROBB CRUSER**

Georgia Bar No. 199480

*Attorneys for Defendant Kuzzins Buford,  
LLC and CC&S Development, LLC*

Meridian II, Suite 2000  
275 Scientific Drive  
Peachtree Corners, GA 30092  
(404) 881-2622  
(404) 881-2630 (fax)  
[cterrett@cmlawfirm.com](mailto:cterrett@cmlawfirm.com)  
[kyoder@cmlawfirm.com](mailto:kyoder@cmlawfirm.com)  
[rcruser@cmlawfirm.com](mailto:rcruser@cmlawfirm.com)